

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
PENELOPE J. BRADY
Assistant United States Attorney
400 South Virginia Street, Suite 900
Reno, Nevada 89501
(775) 784-5438
Penelope.Brady@usdoj.gov

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERMON JAYSON SMARTT, JR.

Defendant.

Case No. 3:24-cr-00004-MMD-CSD

**STIPULATION TO EXTEND TIME
TO FILE EXPERT NOTICES**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and through Jason M. Frierson, United States Attorney for the District of Nevada, Penelope J. Brady, Assistant United States Attorney, counsel for the United States of America, and Leah Wigren, counsel for Defendant Ermon Jayson Smartt, Jr., to extend the time in which the Government's Expert Notice was due on February 9, 2024, to March 12, 2024. Defendant's Expert Notice would be due on March 26, 2024. Rebuttal expert disclosures would be due April 2, 2024. This is the first request for an extension. Trial is currently set for April 9, 2024. The Court's pretrial order, dated February 13, 2024, noted that expert disclosures were due 60 days in advance of trial, which would have been February 9, 2024,

three days after defendant's initial appearance and before the order was issued. *See* ECF No. 12. Counsel are respectfully requesting additional time to file its disclosures due to the nascency of the case. The additional time requested for the filing of expert notices is requested mindful of the current trial date of April 9, 2024, the exercise of due diligence, in the interests of justice, and not for any purpose of delay.

DATED: February 14, 2024

/s/ Penelope J. Brady
PENELOPE J. BRADY

Assistant United States Attorney

/s/ Leah Wigren
LEAH WIGREN

Counsel for Ermon Jayson Smartt, Jr.

IT IS SO ORDERED.

DATED: This 14th day of February, 2024.

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

HON. MIRANDA M. DU
CHIEF UNITED STATES DISTRICT JUDGE